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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Modernizing the E-rate
Program for Schools and Libraries

)
) WC Docket No. 13-184
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**COMMENTS BY CRISPUS ATTUCKS YOUTHBUILD CHARTER SCHOOL RELATED TO
THE E-RATE 2.0 NOTICE OF PROPOSED RULE MAKING**

The Crispus Attucks YouthBuild Charter School is located in York City, Pennsylvania. Most of our students were previously unsuccessful in high school and enrolled in our school as a way to complete their high school education. We provide students ages 17 to 21 the opportunity to earn their high school diploma and at the same time learn job skills. Students attend academic classes and receive vocational construction training on alternating weeks. More than 80% of our students qualify for free or reduced lunches under the National School Lunch Program. Each year we serve 100 – 130 students.

Thank you for the opportunity to comment on the E-Rate 2.0 NPRM.

The E-Rate funding we receive allows us to provide our students with higher speed internet access than we could otherwise afford. Telecom services provide communication between classrooms and between the school building and the vocational construction training sites. We rely on E-rate funding to provide our students with access to high-capacity broadband connectivity and to provide the voice services to allow communication within and outside of the school building. Voice services are essential for insuring the safety of our students while they are attending academic and vocational classes.

Reductions in the funding we receive from the FCC in E-Rate funding could impact the quality of other materials we purchase for the education of our students. Increase the match requirements would reduce the funds available to purchase access to digital textbooks and one-to-one learning opportunities.

In ¶ 105, you propose to phase out services that are used only for voice communications. Rather than elimination of this funding, we would prefer to see it moved to priority 2. If the FCC chooses to

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The Crispus Attucks YouthBuild Charter School will not discriminate on the basis of race, color, national origin, ancestry, religion, age, gender, sexual orientation, or disability.

eliminate funding of voice communication services, we would like to have this phased in over three years to allow for budget adjustments to be made gradually. This would help mitigate the dramatic increase of the costs we would need to cover.

In ¶ 65-66, you propose to make services that provide high-capacity broadband to school and library buildings and those services and equipment that disseminate the high-capacity broadband within those buildings number one priority while deprioritizing or phasing out support for services associated with legacy technologies and services.

We agree that high-capacity broadband access and the equipment to disseminate the high-capacity broadband within buildings should be the number one priority of the E-Rate program. As our school moves to digital textbooks it will be essential to have high-capacity broadband service and WiFi hotspots throughout the school building to provide students access to the materials they need for their education.

In ¶ 101, you are seeking comments on phasing out funding of Basic maintenance of internal connections (BMIC).

While we understand the concerns of the FCC regarding the susceptibility to abuse; however, we believe support of BMIC is needed to insure continued use of and access to high-capacity broadband services throughout the school building.

In ¶ 117 through 125, you are seeking comments on revising the discount matrix.

In the 19 years since our charter school began, we consistently had more than 80% of our students qualify for free or reduced lunches in the NSLP. Our students come to us with many disadvantages and providing high-capacity broadband services throughout the school building needs to be a priority to improve their chances to succeed in school.

We would find it acceptable to phase in a lower discount rate of 80% in order to insure that more schools receive priority one funding. Having this phased in would give us time to identify other sources of funding to replace the potential reduction in E-Rate funding.

In ¶ 135, you are seeking comments regarding a per-student or per-building budget allocation.

We believe this would place smaller schools, like our school, at a disadvantage. Some of the costs for installation and connection to classrooms of high-capacity broadband services may prove higher than the allocation and would the costs would be better addressed using a discount matrix.

In section V. you propose streamlining the administration of the E-Rate program.

We support the electronic communication and application process proposed in ¶ 227.

We support increased transparency throughout the application process in ¶ 232. We find it difficult to understand exactly when we can expect a funding decision based on the many steps an application must go through and the possibility of it going back to initial review even after going to quality assurance 2. The process appears to be cumbersome for USAC. Budgeting cash flow can be difficult when we don't know what funding we can expect.

In ¶ 233 you are seeking comment on ways to reduce the time it takes USAC to review applications for E-rate support. You note that it can be time-consuming and can significantly delay funding commitment decisions. We found this to be the case especially for Priority 2 requests. In 2011, we submitted two applications for Priority 2 funding. We received three requests for additional information on one of the applications. Each time, we felt we supplied all of the requested information and clarified why we felt it was eligible for funding. It was very frustrating to provide the requested information, only to have more questions to answer.

Additionally, for each question, we received an email and a fax from USAC. Only one contact was needed. We specified our preferred method of contact is email.

We fully support simplifying the Eligible Services List as proposed in ¶ 248. It is difficult to determine what is eligible for funding and what category it belongs in based on the current ESL. Allowing choice of vendor regardless of regulatory classification would be very helpful.

In ¶ 298, you are seeking comments on whether applicants should be required to submit competitive bidding documents. If the intention of the FCC is to streamline the process, we believe this requirement would be counter-productive to making the review and decision making faster. Submitting only a bid evaluation sheet would be less cumbersome, but could still delay the decision making.

In ¶ 259, you propose to permit schools and libraries to receive disbursements directly from USAC and to adopt specific invoice deadline and invoice deadline extension rules. We support this completely. It only delays payments to the schools and libraries when the payment goes to a vendor and they have to cut a check to the school/library.

In ¶ 241, you propose to allow E-rate applicants with multi-year contracts that are no more than three years in length (including any voluntary extensions) to file a single FCC Form 471 application for the funding year in which the contract commences and go through the full review process just one time for each such multi-year contracts.

We support submitting only one Form 471 for a multi-year contract. This would reduce the time USAC needs to review applications by significantly reducing the number of forms 471 filed each year. If USAC determined in the first year of a multi-year contract that the service was eligible for funding, that decision should not change in years two and three.